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Attorneys for Defendant
Hartford Life and Accident Insurance Company

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAEL DEVINE,

Plaintiff,

v.

HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY, as Claims
Administrator for Universal Health Services,
Inc.,

Defendant.

Case No. 2:21-cv-02068-JCM-NJK

**STIPULATION, REQUEST AND ORDER
EXTENDING TIME TO RESPOND TO
PLAINTIFF'S COMPLAINT**

[First Request]

The parties, Plaintiff Michael Devine ("Plaintiff"), through his counsel, Julie A. Mersch of the Law Office of Julie A. Mersch, and Defendant Hartford Life and Accident Insurance Company ("Hartford"), through its counsel, Michael R. Brooks of Hutchison & Steffen PLLC

1 and Michael B. Bernacchi of Burke, Williams & Sorensen, LLP, hereby respectfully submit this
 2 Stipulation, Request and Order to Extend Time to Answer or Otherwise Respond to Plaintiff's
 3 Complaint (the "Stipulation"). This Stipulation is made in accordance with Local Rules IA 6-1,
 4 IA 6-2, and II 7-1. This is the first request for an extension of time to file an answer or otherwise
 5 respond to Plaintiff's Complaint.

6 Hartford was served with Plaintiff's Complaint on November 19, 2021, making its current
 7 responsive pleading due on or before December 10, 2021. The instant extension is requested as
 8 Hartford's counsel requires additional time to review their client's file in order to prepare a
 9 meaningful responsive pleading to Plaintiff's Complaint and Hartford's lead counsel is also in the
 10 process of petitioning the Court for permission to practice in this particular case. He has initiated
 11 his petition for permission to practice in compliance with Local Rule IA 11-2 and anticipates
 12 completion within 14 days.

13 Upon agreement by and between all the parties hereto as set forth herein, the undersigned
 14 respectfully requests this Court grant an extension of time, up to and including **January 10, 2022**,
 15 for Hartford to file an answer or otherwise respond to Plaintiff's Complaint. By entering into this
 16 Stipulation, none of the parties waive any rights they have under statute, law or rule with respect
 17 to Plaintiff's Complaint.

18 DATED this 7th day of December, 2021.

20 LAW OFFICE OF JULIE A. MERSCH
 21 Julie A. Mersch

22 By: /s/ Julie A. Mersch

23 Julie A. Mersch
 Nevada Bar No. 004695
 Law Office of Julie A. Mersch
 24 1100 East Bridger Avenue
 Las Vegas, NV 89101

25 Attorney for Plaintiff
 26 Michael Devine

27 IT IS SO ORDERED.

Dated: December 13, 2021

28 .

HUTCHISON & STEFFEN, PLLC
 Michael R. Brooks

BURKE, WILLIAMS & SORENSEN, LLP
 Michael B. Bernacchi

By: /s/ Michael R. Brooks

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Attorneys for Defendant
 Hartford Life And Accident Insurance Company


 United States Magistrate Judge

STIPULATION, REQUEST AND ORDER
 EXTENDING TIME TO ANSWER OR OTHERWISE
 RESPOND TO COMPLAINT